



**State of Rhode Island
DEPARTMENT OF BUSINESS REGULATION
1511 Pontiac Avenue, Bldg. 69-2
Cranston, Rhode Island 02920**

Insurance Division

via email: HouseCorporations@rilegislature.gov

June 30, 2021

Representative Joseph J. Soloman, Jr.
Chair, House Corporations Committee
Rhode Island State House
Providence, RI 02903

Re: House 6429 – An Act Relating To Insurance – Peer-To-Peer Car Sharing Program

Dear Mr. Chairman:

The Department of Business Regulation, Insurance Division, submits this statement concerning H6429.

This bill is based upon the National Association of Insurance Legislators (NCOIL) model act on Peer-to-Peer Car Sharing Programs. Although the title of this legislation is “An Act Relating to Insurance” the bill does not actually regulate insurance or require that insurers undertake any action. Rather, it regulates Peer to Peer Car Sharing Programs and provides which insurance policy applies in various factual scenarios.

DBR is concerned with the inclusion of this statute in Title 27 which regulates insurance companies. There is nothing in the statute which gives DBR jurisdiction over these entities and inclusion of the chapter in a Title which otherwise applies to insurance companies will be confusing. The similar statute regulating Transportation Network Companies was not included in Title 27 although it, and many other licensing statutes, refer to insurance coverage.

We would suggest, therefore, that if the Committee considers this statute that it place its provisions in another chapter of the General Laws to avoid confusion. I am available to answer any questions on this matter. I can be reached at elizabeth.dwyer@dbr.ri.gov or 401.462.9615.

Very truly yours,

A handwritten signature in black ink that reads "Elizabeth Kelleher Dwyer". The signature is written in a cursive style with a large initial "E".

Elizabeth Kelleher Dwyer, Esq.
Superintendent of Insurance

cc. Members of the House Corporations Committee
Representative Jacquelyn M. Baginski